



Time-Critical Removal Actions Hunters Point Shipyard

BCT Meeting
April 26, 2005

Presentation Objectives



- Discussion of Agency Key Concerns
- Comment resolution
- Timeline
- Next steps

Comments Received



- **Metal Debris Reef / Metal Slag Areas Draft Work Plan**
(issued February 18)
 - RWQCB (received March 31)
 - DHS (received April 11)
 - EPA (received April 14)
- **PCB Hot Spot Soil Excavation Draft Work Plan**
(issued February 25)
 - RWQCB (received April 1)
 - EPA (received April 12)
 - DHS (received April 12)
 - DTSC (received April 21)
- **IR-02 Northwest and Central (issued March 9)**
 - RWQCB (received April 5)
 - Comments are due April 25

Agency Key Concerns - MDR and MSA



- Sampling for non-radioactive contaminants.
- Request for use of "armor rock" for shoreline protection and reduce habitat for rats.
- Request for water quality sampling location to be within 20 feet from silt curtain.
- Sampling of dissolved metals for water column monitoring as part of proposed sampling analysis (inside and outside of silt curtain).
- Impacts to wetlands, monitoring plan for wetlands, and wetland scientist/biologist with expertise in wetlands reconstruction.
- Request for limited trenching beyond the excavation boundary to verify extent of waste.

Agency Key Concerns - MDR and MSA



Sampling for non-radioactive contaminants at excavation limit.

- The Navy will add post-excavation characterization sampling for non-radioactive constituents for the bottom and sides of the excavation.

Agency Key Concerns - MDR and MSA



Request for investigation concerning use of "armor rock" for shoreline protection and habitat for rats.

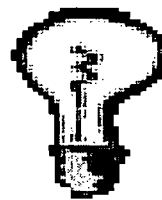
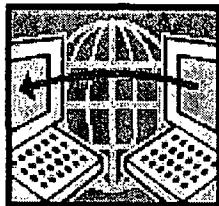
- Armor rock will be used.

Agency Key Concerns - MDR and MSA



Request for water quality sampling location to be within 20 feet from silt curtain.

– OPEN DISCUSSION



Agency Key Concerns - MDR and MSA



Request for sampling of dissolved metals for water column monitoring.

– A dissolved metals sampling protocol will be included in the Draft Final Work Plan. Water quality samples for dissolved metals will be collected when water quality samples for radioactive analytes are collected. Background samples to establish baseline will be collected prior to commencement of excavation activities.

Agency Key Concerns - MDR and MSA



Impacts to wetlands, monitoring plan for wetlands, and wetland scientist/biologist with expertise in wetlands reconstruction

- A stand alone Wetland Mitigation and Monitoring Plan, which will include maps, is being created to ensure that there will be no net loss of wetland acreage and no net loss of wetland value. The mitigation plan includes monitoring and performance criteria.**
- A project wildlife biologist has been identified in the EPP and will be added to all contact lists.**

Agency Key Concerns - MDR and MSA



Request for limited trenching beyond the excavation boundary on the offshore side of the excavation.

- Limited trenching at MDR and MSA will be performed beyond the boundary of the excavation. This trenching will be conducted to confirm the results of the geophysical surveys and ensure that the metal slag and debris does not extend beyond the current excavation limits.**

Agency Key Concerns - PCB Hot Spot



- Request for additional detail or reference of specific agreement concerning the 3,500 ppm total-TPH goal.
- Concern about the 100 ppm PCB goal.
- Discussion on excavation boundary.
- Request for clarification on whether the Navy's intent is to obtain free release of the site.

Agency Key Concerns - PCB Hot Spot



Request for additional detail or reference of specific agreement concerning the 3,500 ppm total-TPH goal.

- Cleanup goal will be corrected to read 3,500 ppm
- The Draft Final Work Plan will be corrected to reflect the actual parties of the agreement.

Agency Key Concerns - PCB Hot Spot



Concern about the 100 ppm PCB goal.

– The cleanup goal was adopted based on 40 CFR (part 761) – Disposal of Polychlorinated Biphenyls (PCBs), which states that PCBs “...may remain at a cleanup site at concentrations > 25 ppm and ≤ 100 ppm if the site is covered with a cap meeting the requirements of paragraphs (a) (7) and (a) (8) of this section.”

- This will enable evaluation of a cap in the Parcel E and E-2 Feasibility Studies.
- Will require revisiting the site if an alternate remedy is selected.

Agency Key Concerns - PCB Hot Spot



Discussion on excavation boundary.

– The time-critical removal action of PCBs is not intended to be parcel-wide. The intent of the removal action is to clean up PCBs that may be potential historic source areas to Parcel F (Battelle, 2005).

Agency Key Concerns - PCB Hot Spot



Request for clarification on whether the Navy's intent is to obtain free release of the site.

- The Navy does not intend to propose free release of the site.**

Agency Key Concerns - IR-02 NW & Central



- Request that soils exceeding appropriate screening concentrations for non-radiological contamination not be reused for site restoration.**
- Request for clarification on how sandblast grit will be recognized during investigation.**

Agency Key Concerns - IR-02 NW & Central



Request that soils exceeding appropriate screening concentrations for non-radiological contamination not be used for site restoration.

- Soil screened for radioactivity will be placed back into the excavation and covered with a minimum of 3-foot layer of clean fill (ecologically protective).**
 - Non-rad contaminant levels consistent with remainder of Parcel E
 - Remedy selection will be site-wide
 - Soil will be characterized and backfilled in order of removal
- Navy will remove all debris, sandblast grit, and free product as encountered**
- To address concerns related to dissolution, expand and refine groundwater monitoring network**

Agency Key Concerns - IR-02 NW & Central



Request for clarification on how sandblast grit will be recognized during investigation

- The site will be excavated on a 50 x 50 foot grid to facilitate identifying and segregating sand blast waste and debris for offsite disposal**
 - A spotter will be used during the excavation work. The spotter will be trained in the recognition of sandblast grit as well as underground utilities. If the spotter or other site personnel recognize sandblast grit, the material will be segregated and sampled for radioactive contamination.

Timeline Parcel E Removal Action Projects



Metal Debris Reef/Metal Slag Areas



PCB Hot Spot



IR-02 Northwest and Central



Next Steps



- Issue RTCs and Draft Final work plans for all three removals.
- Begin field work at PCB Hot Spot and IR-02 Northwest and Central on May 12, 2005.
- Begin work at Metal Debris Reef and Metal Slag Area June 2005.